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WALMART INC.
8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**
11

12 TIFFANY SOLORZANO, an Individual;
13
14 Plaintiff,

15 vs.

16 WALMART, INC., a Foreign Corporation;
DOES 1 Through 25, inclusive, and ROE
17 CORPORATIONS 1 Through 25,
inclusive,
18 Defendants.
19

Case No. 2:21-cv-00109-JAD-VCF

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

[FIRST REQUEST]

20 Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendant WALMART, INC.
21 (“Defendant”) and Plaintiff TIFFANY SOLORZANO (“Plaintiff”), by and through their undersigned
22 counsel, hereby stipulate to amend the Discovery Plan and Scheduling Order (ECF No. 18) by
23 extending the outstanding discovery deadlines for a period of ninety (90) days.

24 This is the first request for an extension to the Discovery Plan and Scheduling Order in this
25 matter. The requested extension is sought in good faith and not for purposes of undue delay. This
26 request is submitted at least twenty-one (21) days or more before the expiration of the subject
27 deadlines.
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REVISED DISCOVERY PLAN

1. Discovery Cut-Off Deadline

The discovery cut-off deadline shall be extended for ninety (90) days from July 26, 2021 to **Monday, October 25, 2021 [Deadline is a Sunday moved to Monday]**.

2. Amending the Pleadings and Adding Parties

The deadline to amend the pleadings and add parties passed on April 27, 2021 and shall not be extended.

3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts)

The expert disclosure deadline passed on May 27, 2021 and shall not be extended.

4. Rebuttal Expert Disclosures

The rebuttal expert disclosure deadline passed on June 28, 2021 and shall not be extended.

5. Dispositive Motions Deadline

The dispositive motion deadline shall be extended for ninety (90) days from August 25, 2021 to **Tuesday, November 23, 2021**.

6. Joint Pretrial Order Deadline

If no dispositive motions are filed, and unless otherwise ordered by the Court, the joint pretrial order deadline shall be filed thirty (30) days after the date set for filing dispositive motions, and therefore, not later than **Thursday, December 23, 2021**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

7. Fed. R. Civ. P. 26(a)(3) Disclosures

Unless the Court orders otherwise, the disclosures required in Fed. R. Civ. P. 26(a)(3) and any objections thereto shall be included in the pretrial order.

8. Extensions or Modification of the Discovery Plan and Scheduling Order

In accordance with Local Rule 26-3, any stipulation or motion for modification or extension of this discovery plan and scheduling order must be made at least twenty-one (21) days prior to the expiration of the subject deadline.

Accordingly, the parties stipulate, subject to approval of this Court, to the following new

proposed deadlines:

	Current Deadline	Revised Deadline
Discovery Cut-Off	July 26, 2021	Monday, October 25, 2021
Dispositive Motions	August 25, 2021	Tuesday, November 23, 2021
Joint Pretrial Order and Disclosures	September 24, 2021	Thursday, December 23, 2021

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

Dated: July 2, 2021

Dated: July 2, 2021

Respectfully submitted,

Respectfully submitted,

/s/ Patrick W. Kang

/s/ Steven J.T. Washington

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Attorneys for Plaintiff
TIFFANY SOLORZANO

Attorneys for Defendant
WALMART INC.

IT IS SO ORDERED.

7-2-2021

Dated: _____



UNITED STATES MAGISTRATE JUDGE

4845-3342-8464.1 / 080000-4158